

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. 18036

**CERTIFICATION OF COUNSEL**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust<sup>2</sup>, hereby certify as follows to the best of my knowledge, information and belief:

1. On June 3, 2024, FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) filed and served the *Debtors’ Motion for Entry of an Order (A) Authorizing Debtors’ Entry Into, and Performance Under, the Settlement with the United States Department of the Treasury – Internal Revenue Service; (B) Approving the Settlement; and (C) Granting Related Relief* [D.I. 16558].

2. On June 20, 2024 the Court entered the *Order (A) Authorizing Debtors’ Entry Into, and Performance Under, the Settlement with the United States of America Regarding Federal Taxes; (B) Approving the Settlement; and (C) Granting Related Relief* [D.I. 18036].

3. On August 15, 2024, the Debtors submitted federal tax returns for the Postpetition Tax Year ending October 31, 2023 (the “2023 Tax Returns”).

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

4. On August 26, 2024, the Debtors requested a determination from the IRS of any unpaid liability of the Debtors' estate on the 2023 Tax Returns pursuant to Section 505(b)(2) of the Bankruptcy Code.

5. Pursuant to Section 505(b)(2) of the Bankruptcy Code, the United States Department of the Treasury – Internal Revenue Service (the “IRS”) is required to complete its examination of the 2023 Tax Returns on or before February 22, 2025, or else the Debtors and their successors shall be discharged from any further federal income tax or employment tax liability upon payment of the tax shown on the 2023 Tax Returns (the “Response Deadline”).

6. The FTX Recovery Trust and the IRS have met and conferred and have agreed, subject to the Court's approval, to extend the IRS's Response Deadline to complete its examination by 90 days (to May 23, 2025) in order to accommodate their ongoing discussions.

7. The Parties' stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is annexed hereto as **Exhibit 1** (the “Order”).

8. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Order at its earliest convenience.

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Dated: January 31, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

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